

## **EXHIBIT 7**

**From:** [Pak, Andrew \(LOS\)](#)  
**To:** [Beirne, Eoin](#)  
**Cc:** [Schieferstein, Daria](#); [Erica Perdomo](#); [Michael Rubin](#); [Sean S. Buckley](#); [Alexandria Swette](#)  
**Subject:** RE: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis  
**Date:** Tuesday, March 11, 2025 4:32:07 PM

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Hi Eoin,

Thank you for the quick response. To clarify, the issue is that Google believes the subpoena is improper. As an initial matter, Mr. Gaddis is a records custodian who has already testified and whom you have had the opportunity to examine. You have indicated that you might need to recall Mr. Gaddis, but have not identified any specific need for his additional testimony. In light of that, it is unreasonable to continue to require that Mr. Gaddis remain on stand-by.

Additionally, it is not evident what additional testimony Mr. Gaddis could provide. As we have noted, Mr. Gaddis is a records custodian whose previous testimony was limited in kind. Mr. Gaddis cannot, for example, authenticate records that Google did not produce to Ms. Javice. If you require the admission of records that Google previously produced to the government, you will need to pursue a stipulation with the government.

I hope that clarifies Google's position. Please let me know today if you plan to withdraw the subpoena in light of the above in order to avoid unnecessary litigation. Otherwise, we will file tomorrow as indicated.

Thanks,  
Andrew

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**From:** Beirne, Eoin <EPBeirne@mintz.com>  
**Sent:** Tuesday, March 11, 2025 3:16 PM  
**To:** Pak, Andrew (LOS) <APak@perkinscoie.com>  
**Cc:** Schieferstein, Daria <DSchieferstein@mintz.com>; Erica Perdomo <ericaperdomo@quinnemanuel.com>; Michael Rubin <Michael.Rubin@kobrekim.com>; Sean S. Buckley <Sean.Buckley@kobrekim.com>; Alexandria Swette <Alexandria.Swette@kobrekim.com>  
**Subject:** RE: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

Hi Andrew,

Is the issue one of scheduling? That Mr. Gaddis is needed elsewhere? We'd be happy to discuss the schedule. But I understand if you prefer to file a motion to quash.

Best,

Eoin

Eóin Beirne  
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**From:** Pak, Andrew (Perkins Coie) <[APak@perkinscoie.com](mailto:APak@perkinscoie.com)>  
**Sent:** Tuesday, March 11, 2025 5:29 PM  
**To:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>  
**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnemanuel.com](mailto:ericaperdomo@quinnemanuel.com)>; Michael Rubin <[Michael.Rubin@kobrekim.com](mailto:Michael.Rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>; Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>  
**Subject:** RE: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

Hi Eoin,

Given that Mr. Gaddis has already testified as a records custodian, and in light of your indication that you do not plan to withdraw the subpoena, we will be filing a motion to quash with the Court tomorrow.

Thank you,  
Andrew Pak

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**From:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>  
**Sent:** Monday, March 10, 2025 3:30 PM  
**To:** Pak, Andrew (LOS) <[APak@perkinscoie.com](mailto:APak@perkinscoie.com)>  
**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnemanuel.com](mailto:ericaperdomo@quinnemanuel.com)>; Michael Rubin <[Michael.Rubin@kobrekim.com](mailto:Michael.Rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>; Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>  
**Subject:** RE: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

Hi Andrew,

I expect the government to rest its case-in-chief early to mid-next week. On behalf of Ms. Javice, we will be deciding who we will call in our defense case between now and when the government rests. I am happy to keep you posted as to whether we decide to re-call Mr. Gaddis or not as that decision is made. For now, we need to keep him under subpoena. If he has intervening scheduling conflicts, I would be glad to try to work around those.

I'm happy to have a call to discuss.

Thanks and best,

Eoin

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---

**From:** Pak, Andrew (Perkins Coie) <[APak@perkinscoie.com](mailto:APak@perkinscoie.com)>  
**Sent:** Monday, March 10, 2025 6:17 PM  
**To:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>  
**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnemanuel.com](mailto:ericaperdomo@quinnemanuel.com)>; Michael Rubin <[Michael.Rubin@kobrekim.com](mailto:Michael.Rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>; Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>  
**Subject:** RE: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

Eoine,

I was hopeful we could avoid litigation, but in light of the fact that there is still an outstanding subpoena, and we haven't been able to resolve this issue, we intend to file a motion to quash your subpoena. We should have our filing in some time tomorrow or Wednesday morning at the latest.

Thank you,  
Andrew Pak

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**From:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>  
**Sent:** Monday, March 3, 2025 9:46 PM  
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**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnemanuel.com](mailto:ericaperdomo@quinnemanuel.com)>; Michael Rubin <[Michael.Rubin@kobrekim.com](mailto:Michael.Rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>; Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>  
**Subject:** Re: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

Not yet. There is an outside chance we will need to recall him. I will keep you posted.

Eóin Beirne  
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**From:** Pak, Andrew (Perkins Coie) <[APak@perkinscoie.com](mailto:APak@perkinscoie.com)>  
**Sent:** Tuesday, March 4, 2025 12:41:36 AM  
**To:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>  
**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnemanuel.com](mailto:ericaperdomo@quinnemanuel.com)>; Michael Rubin <[Michael.Rubin@kobrekim.com](mailto:Michael.Rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>; Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>  
**Subject:** RE: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

Thanks, I had heard that he testified. Can you confirm that your trial subpoena is withdrawn at this point?

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**From:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>  
**Sent:** Monday, March 3, 2025 7:34 PM  
**To:** Pak, Andrew (LOS) <[APak@perkinscoie.com](mailto:APak@perkinscoie.com)>  
**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo

<[ericaperdomo@quinnemanuel.com](mailto:ericaperdomo@quinnemanuel.com)>; Michael Rubin <[Michael.Rubin@kobrekim.com](mailto:Michael.Rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>; Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>  
**Subject:** RE: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

Hi Andrew,

As you may have heard, Mr. Gaddis testified today so we're all set.

Best,

Eoin

Eóin Beirne  
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---

**From:** Pak, Andrew (Perkins Coie) <[APak@perkinscoie.com](mailto:APak@perkinscoie.com)>  
**Sent:** Monday, March 3, 2025 1:04 PM  
**To:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>  
**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnemanuel.com](mailto:ericaperdomo@quinnemanuel.com)>; Michael Rubin <[Michael.Rubin@kobrekim.com](mailto:Michael.Rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>; Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>  
**Subject:** RE: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

Good morning,

I understand that the AUSA may have reached out to you all to discuss authentication of the records we have been discussing. Have you had a chance to discuss that with him? I am happy to jump on a call later today to discuss further.

Thank you,  
Andrew Pak

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**From:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>

**Sent:** Sunday, March 2, 2025 12:58 PM  
**To:** Pak, Andrew (LOS) <[APak@perkinscoie.com](mailto:APak@perkinscoie.com)>  
**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnmanuel.com](mailto:ericaperdomo@quinnmanuel.com)>; Michael Rubin <[Michael.Rubin@kobrekim.com](mailto:Michael.Rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>; Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>  
**Subject:** RE: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

Hi Andrew,

Sorry to bother you on a weekend. Do you have any update following our last conversation?

Has Mr. Gaddis been able to authenticate our documents?

AUSA Fergenson mentioned that he would be in NYC this week for testimony in another case. I would like to again request the opportunity to meet with Mr. Gaddis before he testifies in our case.

Thanks and best,

Eoin

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---

**From:** Pak, Andrew (Perkins Coie) <[APak@perkinscoie.com](mailto:APak@perkinscoie.com)>  
**Sent:** Wednesday, February 26, 2025 4:43 PM  
**To:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>; Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>  
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**Subject:** RE: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

That works for me.

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**From:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>  
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**To:** Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>; Pak, Andrew (LOS) <[APak@perkinscoie.com](mailto:APak@perkinscoie.com)>  
**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnmanuel.com](mailto:ericaperdomo@quinnmanuel.com)>; Michael Rubin <[Michael.Rubin@kobrekim.com](mailto:Michael.Rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>  
**Subject:** Re: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

Sorry, but could we push this to 530?

Eóin Beirne  
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**From:** Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>  
**Sent:** Wednesday, February 26, 2025 2:57:30 PM  
**To:** Andrew Pak <[APak@perkinscoie.com](mailto:APak@perkinscoie.com)>  
**Cc:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>; Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnmanuel.com](mailto:ericaperdomo@quinnmanuel.com)>; Michael Rubin <[Michael.Rubin@kobrekim.com](mailto:Michael.Rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>  
**Subject:** Re: [EXTERNAL] RE: US v. Javice - Files for Cory Caddis

5 should be good. Michael on my team can send a Zoom invite.

Alexandria Swette  
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On Feb 26, 2025, at 1:44 PM, Pak, Andrew (Perkins Coie) [APak@perkinscoie.com](mailto:APak@perkinscoie.com) wrote:

Yep, that works for me, I should be able to make any time work with maybe just a little bit of a heads up.

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---

**From:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>  
**Sent:** Wednesday, February 26, 2025 10:44 AM  
**To:** Pak, Andrew (LOS) <[apak@perkinscoie.com](mailto:apak@perkinscoie.com)>  
**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnmanuel.com](mailto:ericaperdomo@quinnmanuel.com)>; Alexandria Swette <[alexandria.swette@kobrekim.com](mailto:alexandria.swette@kobrekim.com)>; Michael Rubin <[michael.rubin@kobrekim.com](mailto:michael.rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>  
**Subject:** RE: US v. Javice - Files for Cory Caddis

Thanks, Andrew – we expect to be in trial until 5ish so we'll try to circle up and call you then.

Best,

Eoin

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---

**From:** Pak, Andrew (Perkins Coie) <[apak@perkinscoie.com](mailto:apak@perkinscoie.com)>  
**Sent:** Wednesday, February 26, 2025 1:39 PM  
**To:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>  
**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnemanuel.com](mailto:ericaperdomo@quinnemanuel.com)>; Alexandria Swette <[alexandria.swette@kobrekim.com](mailto:alexandria.swette@kobrekim.com)>; Michael Rubin <[michael.rubin@kobrekim.com](mailto:michael.rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>  
**Subject:** RE: US v. Javice - Files for Cory Caddis

Folks,

Can we have another call to discuss this matter? I think there is a logistical issue with respect to your request that I think we can resolve. I can be flexible between 2 pm and 6pm, Eastern Time, and then again from 8pm onwards.

Thank you,

Andrew Pak

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**From:** Beirne, Eoin <[EPBeirne@mintz.com](mailto:EPBeirne@mintz.com)>  
**Sent:** Tuesday, February 25, 2025 5:58 PM  
**To:** Pak, Andrew (LOS) <[apak@perkinscoie.com](mailto:apak@perkinscoie.com)>  
**Cc:** Schieferstein, Daria <[DSchieferstein@mintz.com](mailto:DSchieferstein@mintz.com)>; Erica Perdomo <[ericaperdomo@quinnemanuel.com](mailto:ericaperdomo@quinnemanuel.com)>; Alexandria Swette <[alexandria.swette@kobrekim.com](mailto:alexandria.swette@kobrekim.com)>; Michael Rubin <[michael.rubin@kobrekim.com](mailto:michael.rubin@kobrekim.com)>; Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>  
**Subject:** US v. Javice - Files for Cory Caddis

Dear Andrew,

Many thanks for the call earlier today. As discussed, attached is a set of files that were produced in response to a search warrant to Google (Google Reference Number 44286812) that we expect to show Mr. Gaddis when he testifies next week. In order to ensure an efficient process, please ask Mr. Gaddis to confirm that the

attached were retrieved from the Google Drives that were the subject of the search warrant and are authentic copies of the materials provided to the government.

You will note that for each of the documents, we've included the native file produced by Google as well as an exhibit stamped PDF copy of each file for ease of referring to specific pages when Mr. Gaddis is on the stand.

We would be happy to have a call with you or Mr. Gaddis to talk through any questions.

Thanks and best,

Eoin

Eóin Beirne

Member | Co-Chair, White Collar Defense & Government Investigations

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